

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA
v.
MARTIN GOTTESFELD
Defendant.

Crim. No. 16-CR-10305-NMG

REPLY

Defendant's filing newly expands his requested redactions beyond doxing and in so doing misstates the scope of the charged conspiracy. Paragraphs 17 and 31 of the Indictment charge Gottesfeld and his coconspirators with conducting "disruptive network attacks," not simply with committing DDOS attacks. Exhibit 97E, the "HIPAA next" tweet, mentions both the DDOS and threats to steal patient information, both of which were part of the network attack that potentially affected patient care. The tweet is simply an overt act in furtherance of the conspiracy to commit disruptive attacks. Where hospitals witnesses are expected to testify that the hospital did in fact experience two kinds of disruption after this tweet, DDOS and network penetration attempts, Exhibit 97E is highly relevant and not unduly prejudicial.

Respectfully submitted.

ANDREW E. LELLING
UNITED STATES ATTORNEY

By: /s/ Seth B. Kosto
SETH B. KOSTO
DAVID J. D'ADDIO
Assistant U.S. Attorneys

July 20, 2018

CERTIFICATE OF SERVICE

I hereby certify that, on this date, this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants.

/s/ *Seth B. Kosto*
Seth B. Kosto
David J. D'Addio
Assistant U.S. Attorneys

July 20, 2018